

EXHIBIT 6

REPORT OF OPINIONS OF LAWRENCE J. WINIKUR, M.D.

QUALIFICATIONS

I, Lawrence J. Winikur, M.D., an anesthesiologist and owner of Piedmont Pain Medicine, PC, state as follows:

I obtained my medical degree from the Medical College of Virginia and performed my internship at Roanoke Memorial Hospital. I completed my residency in Anesthesiology and fellowship training in Pain Medicine at the Mayo Clinic in Rochester, Minnesota. I am board certified in Anesthesiology and Pain Medicine.

I am currently the Medical Director of Piedmont Pain Medicine in Danville, Virginia.

I have been continuously licensed to practice medicine in the State of Virginia from 1999 until the present. During the 12 months preceding September 2012 until the present, I have practiced in the specialty of Anesthesiology and Pain Medicine.

Additional details regarding my education and training, as well as a list of my publications during the last ten years, are contained in my *Curriculum Vitae*, copy attached.

I manage Piedmont Pain Medicine, P.C. in Danville, Virginia and have operated that pain management clinic throughout (and preceding) the period 2011 to the present. I am familiar with the standard of care in the field of anesthesiology and pain medicine including the treatment of patients with epidural steroid injections and the management of pain centers in Danville, Virginia and Greensboro, North Carolina. Additionally, I am familiar with Greensboro, North Carolina and its medical community based on: patient referrals to and from physicians in Greensboro; review of patients' charts who received treatment from Greensboro physicians; discussions with Greensboro physicians concerning patient care, both with regard to pain management patients and patients receiving general medical and surgical care and discussions with physicians in Greensboro, North Carolina concerning the management of pain centers. I am generally familiar with the Greensboro community.

Based on information provided to me relating to Nashville, Tennessee including but not limited to the number of hospitals, community size, availability of medical specialties and medical services, demographic information including population, median age, median income, gender and educational background it is my opinion that Greensboro, North Carolina and Nashville are similar communities.

Furthermore, the medical and physiological considerations involved in the administration of epidural steroid injections for pain treatment are not influenced by any geographic differences between Danville, Greensboro, and Nashville. Physicians in these communities have access to the same information, equipment and medication. Treatment of patients with epidural steroid injections does not change from Danville to Greensboro, to Nashville. Nor does the management of pain management centers change from communities such as Danville to Greensboro to

Nashville.

Regarding the issues in this matter, the standard of care is the same for patients presenting to Saint Thomas Outpatient Neurosurgical Center in 2012 as they are in Danville, Greensboro, Nashville or other similar communities.

Based on my education, training and experience, I am familiar with the recognized standard of acceptable professional practice in the specialty of anesthesiology and in the management of pain centers in Danville, Virginia, Greensboro, North Carolina and similar communities during 2011- 2012.

INFORMATION REVIEWED

My statements are based on my background, training and experience as well as the following information, which I reviewed:

- Medical records of 5 patients who received epidural steroid injections at Saint Thomas Outpatient Neurosurgical Center during 2012;
- Documents regarding the regulatory history of New England Compounding Pharmacy, Inc., d/b/a/ New England Compounding Center ("NECC");
- Information from the United States Centers for Disease Control and Prevention ("CDC"), including the *Morbidity and Mortality Weekly Report* dated December 13, 2002 regarding certain cases of fungal meningitis caused by contaminated epidural steroids made by a compounding pharmacy;
- Information from an October 23, 2003 hearing before the United States Senate's Committee on Health, Education, Labor, and Pensions regarding pharmacy compounding;
- Information published by the United States Food and Drug Administration ("FDA") regarding compounded drug products, compounding pharmacies, and the risks associated with compounded drugs;
- Information published by The American Society of Health System Pharmacists warning the pharmacy and medical community of the risks of using compounded drugs;
- Certain Federal, Tennessee and Massachusetts pharmacy laws governing pharmacy compounding; and
- The depositions of Debra Schamberg, R.N., John Culclasure, M.D., Jeff Ebel, Carmen Leffler, D.Ph., Martin Kelvas, D.Ph., and Terry Grinder,